



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 24 2012

REPLY TO THE ATTENTION OF:

Wilhemina McLemore
Detroit District Supervisor
Michigan Department of Environmental Quality
Detroit District Office
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Dear Ms. McLemore:

The U.S. Environmental Protection Agency has reviewed the draft initial Renewable Operating Permit MI-ROP-K1271-20XX for Henry Ford Hospital located in Detroit, Michigan. Based on our review, we have the following comments.

1. Conditions I.1, I.2, and I.3 for Emission Unit (EU)-ENGINE12a, located on page 14 of the draft permit, establish the emission limits required for a 2,000 kW, 20 MMBtu/hr diesel-fired generator. These conditions come from PTI 186-06B via Subpart IIII of 40 C.F.R. 60. Condition IX.1 of PTI 186-06B for EUENGINE12a, included in this draft permit as Condition IX.1 for EU-ENGINE12a on page 16, states that "the permittee shall comply with all applicable requirements of [40 C.F.R. 60 Subpart IIII]". 40 C.F.R. § 60.4205 refers to Table 1 to Subpart IIII of 40 C.F.R. 60 which contains the applicable emission limits for this engine, including an emission limit for hydrocarbons (HC) of 1.3 g/kW-hr. However, the limit for HC emissions is not included in this permit. Please either add the HC limit of 1.3 g/kW-hr to this permit or provide an explanation why this limit is not applicable to EU-ENGINE12a.
2. Conditions I.1, I.2, and I.3 for EU-ENGINE12a refer to conditions II.3 and II.4 for monitoring and testing. However, these conditions do not seem to exist in this draft permit. If conditions II.3 or II.4 are included as conditions within another part of the permit, such as a flexible group that includes EU-ENGINE12a as a member unit, then the permit should reflect that location in the permit when the reference is established. However, if the reference to conditions II.3 and II.4 is to a requirement for another unit or flexible group for which EU-ENGINE12a is not a member then the requirements should be repeated for EU-ENGINE12a specifically. Please either update both references to existing conditions that provides for sufficient monitoring, reporting, and recordkeeping of the emission limits or add conditions for monitoring and testing sufficient to ensure compliance with the limits in Conditions I.1, I.2, and I.3.

3. Condition II.2 for EU-PAVGEN8, located on page 20 of the draft permit, limits the amount of distillate oil used in the West Pavilion Emergency Generator to 58,000 gallons of distillate oil per rolling 12-month period. Special Condition (SC) 5 of PTI 355-97 establishes the limit at 58,500 gallons of distillate oil per rolling 12-month period. Please either update the permit to read 58,500 gallons as opposed to 58,000 gallons or provide an explanation why the limit changed.
4. Condition I for EU-BUNITGEN, located on page 22 of the draft permit, establishes emission limits for the B unit-HFHS No. 9 emergency generator. The permit refers to General Condition (GC) 12 of the permit as the method for testing and monitoring compliance with these limits. GC 12 says that the permittee shall not emit air contaminants in quantities that impact human health, safety, and enjoyment of life and property. As written, GC 12 does not seem to provide for sufficient monitoring or testing to show compliance with the emission limits. Please either add sufficient monitoring, testing, and recordkeeping so that compliance with the emission limits can be enforced practically, provide a reference to an appropriate specific permit condition that can be used to ensure continuous compliance with the emission limits, or provide an explanation why the current monitoring, testing, and recordkeeping requirements in the draft permit are sufficient to ensure continuous compliance with these limits.
5. Condition II.2 for EU-BUNITGEN, located on page 22 of the draft permit, states that the sulfur content of the fuel used in this emergency generator shall not exceed 15 ppm. The permit does not contain monitoring, testing, or recordkeeping to ensure compliance with the sulfur content limit. The permit should at least include keeping records of the sulfur content in the fuel as per SC 3 of PTI 307-99. Please either add sufficient monitoring, testing, and recordkeeping requirements to ensure compliance with the sulfur content limit in the fuel or explain why the current monitoring, testing, and recordkeeping requirements in the draft permit are sufficient to ensure compliance with this limit.
6. PTI 287-01 establishes emission and material usage limits for EUCLVBOILER of 7.15 tpy and 143 MMCF of natural gas, both calculated as a 12-month rolling sum, respectively. Neither limit is included on page 24 of the draft permit. Additionally, page 13 of the draft permit states that EUCLVBOILER meets current exemption requirements. Please clarify the exemption for which EUCLVBOILER qualifies. If necessary, the conditions for EUCLVBOILER to qualify for the exemption should also be included in the permit. Also, please either add the emission and material usage limits as listed in PTI 287-01 along with sufficient monitoring and testing to ensure compliance or explain why these limits are no longer required.
7. Condition I.1 for FGPEAKSHIVERS, located on page 28 of the draft permit, establishes a Nitrogen Oxides emission limit of 13.5 tpy for member units of this flexible group. Condition III.1 for FGPEAKSHIVERS establishes an operational restriction of 1,500 hours per 12-month rolling time period as established at the end of each calendar month. Currently, the draft permit does not require the permittee to track the number of hours the units are operated. Please either add sufficient monitoring and testing to ensure

continuous compliance with these limits or explain why the monitoring and testing is sufficient to ensure continuous compliance with the operating limit.

8. PTI 279-07 is included in the permit record for Henry Ford Hospital. However, this PTI is not listed in the table under Appendix 6 on page 43 of the draft permit. Please ensure that the requirements from PTI 279-07 are added to the draft permit or explain why the conditions established in PTI 279-07 no longer apply to the source.
9. The following minor typographical errors were found while reviewing the permit:
 - a. Condition III.2 of EUTOSTER1, located on page 18 of the draft permit, should begin as "The permittee shall not operate [...]".
 - b. The word "e" should be "be" in the second sentence of Condition VII.3 for EUTOSTER1, EU-PAVGEN8, EU-BUNITGEN, and FGENGINES.
 - c. Condition I.1 for FGENGINES, located on page 30 of the draft permit, refers to SC I.2 for monitoring/testing method. This condition does not exist within this permit.
 - d. Conditions III.4, III.5, and III.6 for FG-ENGINES 9-10-11, located on page 32 of the draft permit, should refer to EUENGINE9, EUENGINE10, and EUENGINE 11, respectively.
 - e. Condition VI.1 for FG-ENGINES 9-10-11, located on page 33 of the draft permit, the hour meter should be "with a non-resettable" as opposed to "with-resettable".
 - f. Condition II.3 for FGBOILERS, located on page 38 of the draft permit, should limit natural gas usage to 1,515,480,000 cubic feet per year as opposed to 1,515,480,000 gallons per year of fuel oil per PTI 186-06B.
 - g. The third line of the table on page 43 of the draft permit should refer to PTI 355-97 instead of 355-98.

We appreciate the opportunity to provide comments on this draft initial permit. Please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,



Genevieve Damico
Chief
Air Permits Section